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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



247890

REPLY TO THE ATTENTION OF

HSE-5J

MEMORANDUM

DATE: MAR 08 1995

SUBJECT: ACTION MEMORANDUM - Request for a Time Critical
Emergency Removal Action at West Roosevelt Drum Site,
Chicago, Cook County, Illinois (Site ID # ON)

FROM: Charles Gebien, On-Scene Coordinator *Ch Gebien*
Emergency and Enforcement Response Section II

TO: William E. Muno, Director, Waste Management Division

THRU: Jodi L. Traub, Associate Division Director, Office of
Superfund *Jodi Traub*

I. PURPOSE

The purpose of this memorandum is to obtain your approval to expend up to \$595,520 in order to conduct a time critical removal action as described herein at the West Roosevelt Drum (WRD) Site in Chicago, Cook County, Illinois. The site is an defunct granary, in which, approximately 300 drums of hazardous wastes and approximately 50 compressed gas cylinders were abandoned. The proposed removal action seeks to alleviate the threat to public health and the environment from these hazardous substances by removing and disposing of them. The proposed removal action is considered a time critical action due to the direct contact threat from these chemicals, and to the potential for fire and explosion. The project will require approximately forty on-site working days to complete.

The site is not included on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID# IL001039056

A. Site Location

The WRD site is located at 5728 West Roosevelt Road, in an industrial area of Chicago, Cook County, Illinois (See Figure 1, Site Location Map). The site topography is flat and the surrounding area is industrial, commercial, and residential. The site is bordered by commercial properties on the west, north, and east. A residential neighborhood is located south of the site, directly across Roosevelt Road.

B. Site Description and Background

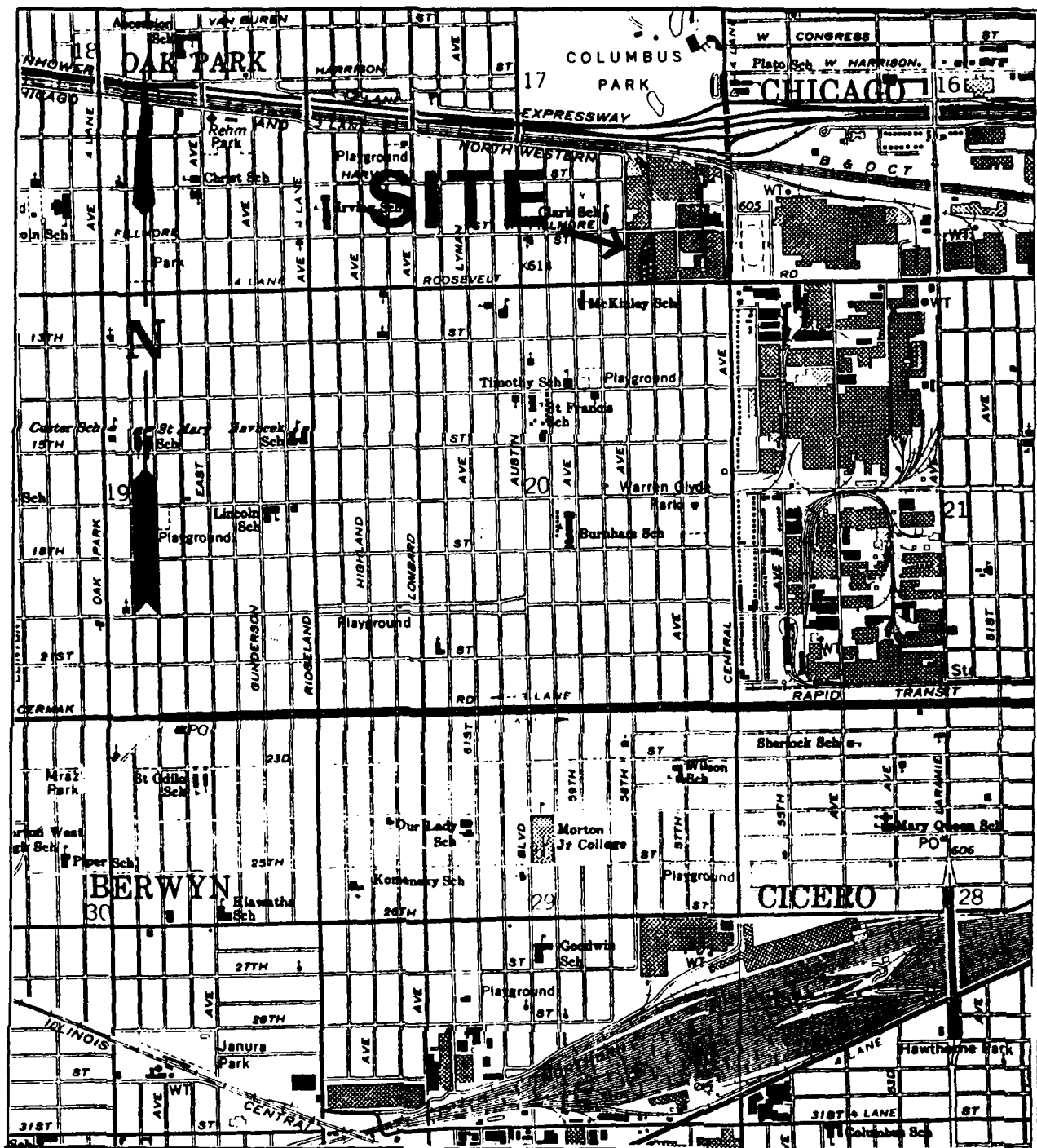
The WRD site is an approximately 25,000 square foot abandoned property which contains two buildings and two grain silos. The larger of the two buildings (Building 1) is a two-story brick structure which houses an office area and what appears to be a former grain processing area. The grain processing area contains approximately 300 drums of hazardous wastes including ignitable liquids (D001), acids and caustic corrosives (D002), water reactive aluminum chloride (D003), ethyl phthalate (U088), and other unknown materials (See Figure 2, Site Features Map). The site's buildings are in deteriorating condition have been badly vandalized. Portions of the roof and second floor in Building 1 have collapsed onto the main floor near the drummed wastes and most of the windows are broken. Although some of the doors and windows in Building 1 have been boarded with plywood, vandals have pulled the plywood from the doors to gain access.



C. Current Site Conditions

On January 27, 1995, the U.S. EPA, the Ecology and Environment (E & E) Technical Assistance Team (TAT), the Illinois Environmental Protection Agency (IEPA), and the Chicago Department of the Environment (CDOE), conducted a site assessment at the WRD site. The site was found to be unsecured by fencing or other means and access to the buildings was easily attained because of open doorways and broken windows. Approximately 300 drums were observed in Building 1, some of which were labeled as hazardous or corrosive materials. Many of the drums have leaked their contents to the floor.

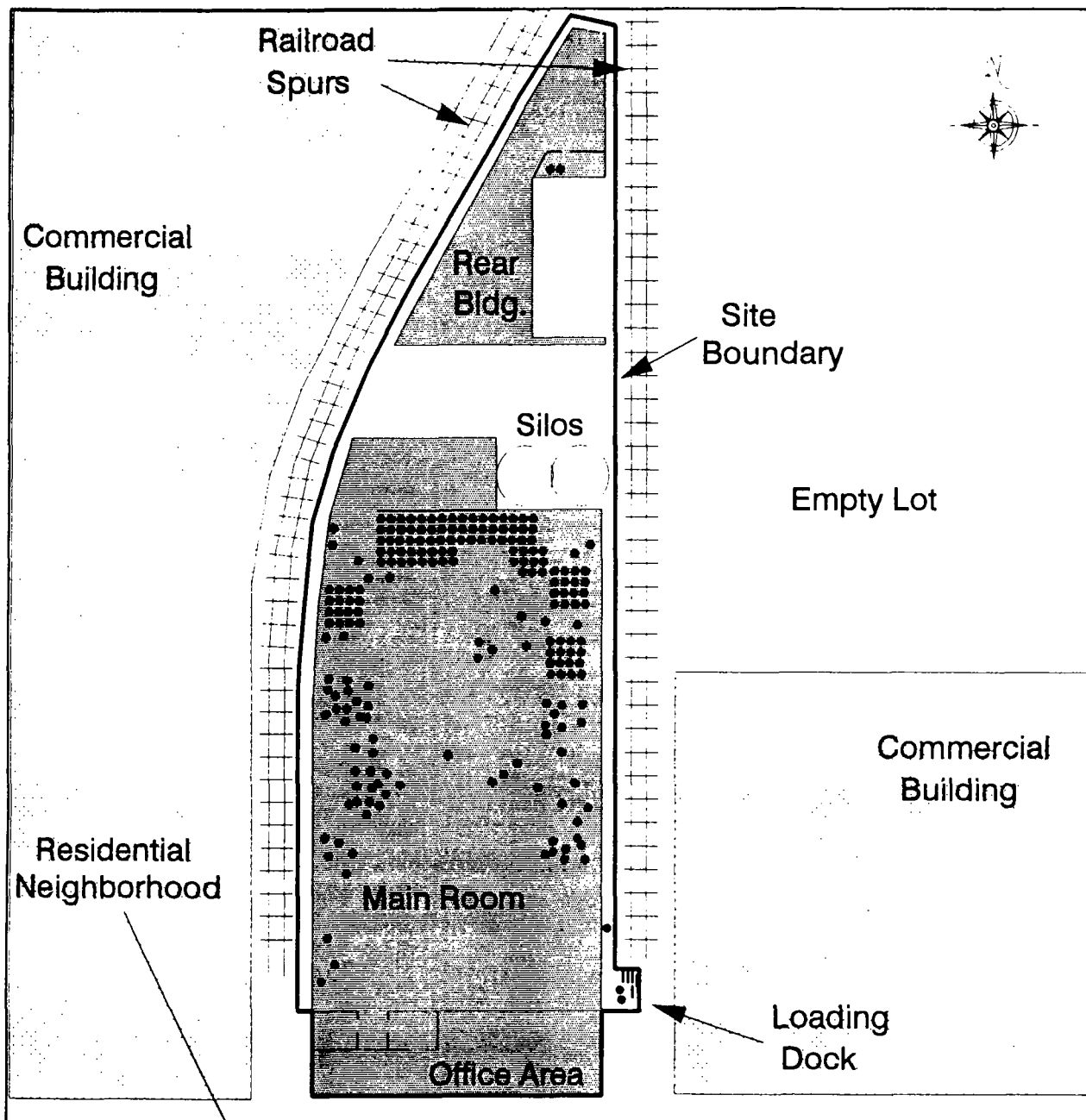
D. State and Local Authorities Roles

The Chicago Department of the Environment (CDOE) records indicate that the WRD site was a former granary dating to 1916. A title search performed for the City of Chicago on January 12, 1993, indicates the Skokie Trust & Savings Bank as Trustee under trust



	 EPA U.S. EPA REGION V EMERGENCY AND ENFORCEMENT RESPONSE BRANCH Chicago, IL 60604		
	TITLE		FIGURE #
	SITE LOCATION MAP		2-1
	SITE		SCALE
WEST ROOSEVELT DRUM SITE		1" = 2000'	
CITY		STATE	PAN
CHICAGO		IL	EIL0856SAA

MAP SOURCE
USGS MAP, 7.5 MINUTE SERIES
BERWYN, ILL QUADRANGLE



LEGEND

- Drums/Containers
- III Compressed Gas Cylinders



Chicago, IL 60604

TITLE	SITE FEATURES MAP			FIGURE #	3-1
SITE	WEST ROOSEVELT DRUM SITE			SCALE	not to scale
CITY	CHICAGO	STATE	IL	PAN	EIL0856SAA

agreement as of June 25, 1985. The title search identified Mohammed Farhat Gheith as a possible beneficiary of the land trust holding title to the estate as of July 3, 1985.

According to a Chicago Department of Planning and Development Memorandum, Genda, Inc. submitted a tax reactivation application for redevelopment of the property in 1991. In August of 1992, John Crededio, a local property developer, expressed interest in the property should Genda, Inc. withdraw their application. Mr. Crededio made his interest official in February 1994 on behalf of the West Roosevelt Road Corporation (WRRRC). Genda, Inc. withdrew their application in May 1994 and the Chicago City Council approved WRRRC as the new applicant for tax reactivation in September 1994. WRRRC was granted receivership and planned to raze the existing structure and install a parking and storage facility for a nearby movie studio. WRRRC designated \$50,000 for environmental testing and remediation for this effort.

On October 21, 1994, Mr. Crededio filed a report with the Illinois Emergency Management Association (IEMA) regarding unsafe conditions at the site. A board-up company had been retained by WRRRC to secure the site. According to the incident report, the board-up "crew was overcome with an acid smell/eye irritant chemical spill from a 55-gallon drum" overturned apparently sometime the previous evening. Mr. Crededio stated the chemical odor could be identified up to 1½ blocks from the site. The report also stated that a Chicago City Police officer, Chris Pataglia, 15th District discovered that a Mike Gheith previously owned the property and used it to house hazardous wastes.

On October 24, 1994, the Illinois Environmental Protection Agency (IEPA) was notified of conditions at the site and immediately conducted an inspection of the premises. The leaking drum was labeled thioglycolic acid (a.k.a. mercaptoacetic acid). Thioglycolic acid has a strong irritating odor, is a skin irritant, and is typically classified as a corrosive material. The IEPA measured the pH of the thioglycolic acid and reported a level of 0.0 standard units. IEPA subsequently contracted Riedel Environmental Services (RES) to immediately mobilize to the site to address the leaking drum. RES arrived at the site later that day and overpacked the leaking drum as well as contaminated debris found in the spill area.

The WRD site was designated a 1995 Brownfield Fund Candidate for remediation with the intent to reactivate the property for future commercial use. On January 6, 1995 the CDOE requested assistance from the U.S. EPA in evaluation of threat(s) to public health and/or the environment posed by the site. Mr. Ed Osowski, IEPA, indicated that IEPA currently does not have the resources to conduct further removal activities at the site. The U.S. EPA will inform Mr. Osowski of all actions proposed or taken

pertaining to the site.

III. THREAT TO PUBLIC OR WELFARE OR THE ENVIRONMENT

Conditions present at the WRD site may constitute an imminent and substantial threat to public health and welfare and the environment, based upon considerations set forth in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Section 300.415 (b) (2), and therefore may justify that a time-critical removal action be conducted at the site. These conditions include, but are not limited to, the following:

- 1) Actual or potential exposure to nearby populations, animals, or the food chain from hazardous substances, pollutants, or contaminants.**

Site investigations conducted by the U.S. EPA and IEPA and sample analytical data have found that there are open drums and containers of Resource Conservation and Recovery Act (RCRA) hazardous wastes (D001, D002, D003, and U088) at the site. Some of the containers are leaking their contents to the floor of Building 1, and none of the drums are protected from the public. An act of vandalism on October 21, 1994, resulted in a release of thioglycolic acid to the atmosphere which caused illness to nearby workers and caused a strong odor detectable up to 1½ blocks from the site. The unsecured and deteriorating containers of hazardous wastes also pose a direct contact and inhalation hazard to persons in the building. Specifically, labels of the following substances were observed at the site in unsecured containers:

aluminum chloride: one form of aluminum chloride will react violently with water and generate hydrogen chloride gas. Contact with metal and water may release hydrogen gas, presenting a possible fire hazard. Pure product classified as a corrosive.
thioglycolic acid: skin irritant with strong irritating odor. A sample this material identified it as a hazardous waste (D001).
triethanolamine 99%: combustible liquid, skin irritant and possible carcinogen.
ethyl phthalate: poisonous and corrosive liquid, found to be a RCRA hazardous waste by toxicity (U088).
diethylene glycol: poisonous and combustible liquid used as an antifreeze.

- 2) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;**

Site investigations found approximately 300 drums some of which have been identified as RCRA hazardous wastes (D001, D002, D003, and U088) within the site. Many of the drums have leaked their contents to the floor. Drums and other containers are stored together and in some areas are triple stacked irrespective of

their incompatibility. Approximately fifty compressed gas cylinders, some of which were labeled as oxygen and acetylene, were found scattered in the indoor and outdoor areas of the site.

3) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

All of the uncontrolled drums, containers, and gas cylinders at the site are exposed to the weather. The site's buildings are in deteriorating condition and have been badly vandalized. Portions of the Building 1 roof and second floor have collapsed onto the main floor near the drummed wastes and most of the windows are broken. Utility services at the site have been disconnected since the abandoning of the facility and extreme heat or cold and precipitation could cause accelerated deterioration of the drums. Many of the drum lids and sides of the drums have corroded and have already released their contents to the floor of building 1. Flooding conditions in Building 1 may release spillage of hazardous wastes to outdoor areas.

4) Threat of fire or explosion;

Drummed flammable liquids and water reactive wastes were found at the WRD site. Approximately fifty compressed gas cylinders, some of which were labeled as oxygen and acetylene, were found scattered in the indoor and outdoor areas of the site. A recent act of vandalism at the site has resulted in a release of hazardous waste from a drum to the atmosphere. The unsecured conditions at the site may allow additional acts of vandalism, which may result in a fire or explosion.

IV. ENDANGERMENT DETERMINATION

Open drums, compressed gas cylinders, and other improperly stored containers of hazardous wastes (D001, D002, D003, and U088) at the WRD site contain flammables, acids, corrosive caustics, water reactive wastes, poisons, and unknown wastes. These wastes pose inhalation, ingestion, and contact hazards to trespassers and salvage workers, as well as surrounding residents in this mixed residential and industrial area.

Given the site conditions, the nature of the hazardous substances on site, and the potential exposure pathways to nearby populations described in Section III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description

The purpose of this removal action is to mitigate the imminent and substantial threats posed to public health or welfare or the environment from wastes stored at the site. The proposed time-critical emergency response action includes the following actions which can be divided into two phases of work:

Phase I:

- 1) Develop and implement site health and safety plan.
- 2) Move all containers to a securable storage area and overpack leaking or unstable containers. Separate containers judged incompatible based on the container label.
- 3) Sample contents of all containers and segregate, stage, and categorize for disposal.
- 4) Collect additional samples of waste spillage on floor areas, and categorize for disposal.
- 5) Make arrangements for off-site disposal of wastes.

Phase II:

- 6) Consolidate materials into specified waste streams, package for shipment, transport to an off-site disposal facility. As appropriate, some wastes may be neutralized on-site prior to disposal.

Waste transportation and disposal will be handled in full compliance with the Agency's off-site policy. Provisions for post-removal site control are being planned by the OSC consistent with the provisions of Sections 300.415 (k) of the NCP.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the WRD site which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

2. Contribution to Remedial Performance

The WRD site is a non-NPL site for which remedial actions have not been planned to date. The proposed removal action will

address all threats meeting the NCP Section 300.414 (b) (2) removal criteria as identified in Section III of this Action Memo.

3. Applicable or Relevant and Appropriate Requirements (ARARs)

On January 27, 1995, OSC Charles Gebien contacted Ed Osowski, IEPA, and verbally requested that he identify State ARARs. All Federal ARARs and any Illinois ARARs identified in a timely manner will be complied with the extent practicable.

4. Project Schedule

Phase I and II removal activities will require an estimated 40 11-hour working days. Disposal arrangements will require approximately 21 days to complete after completion of Phase I.

B. Estimated Costs

The estimated costs of the recommended action are summarized in the following table. The detailed Emergency Response Cleanup Services (ERCS) contractor costs and initial cost projection scenario on the Removal Cost Management System (RCMS) is presented in Attachment A.

EXTRAMURAL COSTS:

Cleanup Contractor Costs	\$358,000
Contingency (20%)	\$71,600
Subtotal	\$429,600
Total TAT, including multiplier costs	\$38,000
Extramural Subtotal	\$467,600
Extramural Contingency (20%)	\$93,520
TOTAL, EXTRAMURAL COSTS	\$561,120

INTRAMURAL COSTS:

U.S. EPA Direct Costs [\$30 x (400 Regional Hrs. + 40 HQ Hrs.)]	\$13,200
U.S. EPA Indirect Costs [\$53 x 400 Regional Hrs.]	\$21,200
TOTAL, INTRAMURAL COSTS	\$34,400
TOTAL REMOVAL PROJECT CEILING	\$595,520

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action will increase the likelihood of release due to tampering with drums or other vessels containing hazardous substances by trespassers, salvagers, and vandals, and/or weather damage. Any such release or exposure will contribute and ultimately lead to increased risks to public health and the environment.

VII. OUTSTANDING POLICY ISSUES

There are no outstanding policy issues for the WRD site.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential Addendum presented in Attachment B.

IX. RECOMMENDATION

This decision document represents the selected removal action for the West Roosevelt Drum site, in Chicago, Illinois, developed in accordance with the Comprehensive Environmental Response, Cleanup, and Liability Act (CERCLA) as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the site (Attachment C). Conditions at the site meet the NCP section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be \$595,520. Of this, an estimated \$557,520 may be used for cleanup contractor costs. You may indicate your decision by signing below:

APPROVE: _____

DIRECTOR, WASTE MANAGEMENT DIVISION

DATE: _____

3/8/75

DISAPPROVE: _____

DIRECTOR, WASTE MANAGEMENT DIVISION

DATE: _____

ATTACHMENTS: A. REMOVAL COST ESTIMATE
 B. ENFORCEMENT CONFIDENTIAL INFORMATION
 C. ADMINISTRATIVE RECORD

cc: T. Johnson, OS-210
 Don Henne, Regional Environmental Officer
 U.S. Department of the Interior, Custom House Room 217
 200 Chestnut Street, Philadelphia PA 19106-2904
 Larry Eastep
 Division of Land Pollution Control
 Illinois Environmental Protection Agency
 2200 Churchill Road, Springfield, IL 62706
 IEPA Superfund Coordinator

bcc: A. Baumann, HSRL-5J
 R. Powers/R. Buckley, HSE-GI
 R. Karl, HSE-5J
 J. Cisneros, HSE-5J
 L. Fabinski, ATSDR, HSRL-5J
 O. Warnsley, CRU, HSRL-5J
 T. Lesser, P-19J
 F. Meyers, MF-10J
 EERB Read File (M. Johnson)
 EERB Delivery Order File (M.E. Gustafson)
 EERB Site File (Earl Brenneman, WMD Records Center)
 Contracting Officer, MC10-J
 C. Gebien, On-Scene Coordinator
 A. Warren, Attorney, ORC CS-3T
 B. Guria, Enforcement Specialist HSE-5J

ATTACHMENT A

REMOVAL COST ESTIMATE

(Portions of this attachment have been redacted - not
relevant to the selection of the Removal Action)

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Summary Report
Initial Cost Projection Scenario: WEST ROOSEVELT DRUM

1

Projection ID Number: WRD
Cleanup Contractor: RES5 - Riedel Environmental

Date: 02/07/95
TAT Contractor: E&E

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Cost Projection Summary

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Contractor Personnel	159,368.70
Contractor Equipment	35,227.85
Unit Rate Materials	37,547.69
At Cost Materials	1,463.00
Subcontractors	25,919.66
Waste Transportation	12,540.00
Waste Disposal	85,899.00

Cleanup Contractor Subtotal	357,965.90
Federal and State Agencies	0.00

Extramural Subtotal	357,965.90
20 % Extramural Contingency	71,593.18

Extramural Subtotal	429,559.08
TAT Personnel	37,681.50
TAT Special Projects	0.00
TAT Analytical Services	0.00

Total TAT Costs	37,681.50
Other Cost Items	0.00

Extramural Subtotal	467,240.58
20 % Project Contingency	93,448.12

Total Extramural Cost	560,688.70
EPA Regional Personnel	15,600.00
EPA Non-Regional Personnel	0.00
EPA Headquarters Direct	1,560.00
(10 % of Regional Hours)	
EPA Indirect	33,280.00

EPA Total	50,440.00

Project Total	611,128.70

ATTACHMENT B
ENFORCEMENT ADDENDUM

Redacted - not relevant to the selection of the removal action.

ATTACHMENT C

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
WEST ROOSEVELT DRUM SITE
CHICAGO, COOK COUNTY, ILLINOIS

February 27, 1995

<u>DATES</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
02/17/95	Ecology & Environment, Inc.	U.S. EPA	Site Assessment Report	37
00/00/00	Gebien, C., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum (Pending)	